

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
	)	
BIG LOTS, INC., <i>et al.</i>	)	Case No. 24-11967 (JKS)
	)	
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	
	)	<b>Re. D.I. 2808</b>
	)	

**CERTIFICATION OF COUNSEL REGARDING JOINT STIPULATION BY AND  
AMONG THE DEBTORS AND LIPP CDS, INC. RESOLVING MOTION OF LIPP CDS,  
INC. FOR LEAVE TO FILE PROOF OF CLAIM AFTER CLAIMS BAR DEADLINE**

1. On May 28, 2025, Lipp CDS, Inc. ("Lipp CDS") filed the *Motion of Lipp CDS, Inc. for Leave to File Proof of Claim After Claims Bar Deadline* [D.I. 2808] (the "Motion"). The Motion sought, among other things, entry of an order extending the time by which Lipp CDS may to file a proof of claim in the above-captioned chapter 11 cases (the "Chapter 11 Cases") by thirty (30) days following entry of such order.

2. Objections to the Motion were due by 4:00 p.m. (ET) on June 19, 2025 (the "Motion Objection Deadline"). The Motion was scheduled to be heard at the omnibus hearing scheduled in the Chapter 11 Cases on June 26, 2025, at 1:00 p.m. (prevailing Eastern Time).

3. Prior to and following the Motion Objection Deadline, the debtors and debtors-in-possession (collectively, the "Debtors") in the Chapter 11 Cases engaged in extensive

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin Granville Road, Columbus, OH 43081.

good-faith negotiations with Lipp CDS concerning the relief requested in the Motion. Lipp CDS consensually extended the Motion Objection Deadline for the Debtors to allow for these negotiations to proceed without the Debtors having to file a protective objection. No other party-in-interest filed or otherwise lodged any objection to the relief requested in the Motion prior to the Motion Objection Deadline, and no other party-in-interest sought, or was granted, an extension to do so.

4. Following the aforementioned negotiations, the Debtors and Lipp CDS have consensually resolved the Debtors' objections to the relief requested in the Motion as memorialized in the *Joint Stipulation by and Among the Debtors and Lipp CDS, Inc. Resolving Motion of Lipp CDS, Inc. for Leave to File Proof of Claim After Claims Bar Deadline* (the "Stipulation"). The Stipulation is attached as Exhibit 1 to the proposed order (the "Proposed Order") that is attached hereto as **Exhibit A** and that seeks approval of the Stipulation.

5. The undersigned further certifies that the terms of the Stipulation have been approved and supported by Lipp CDS.

6. The undersigned respectfully requests entry of the Proposed Order authorizing the Stipulation without further notice or a hearing.

*[Remainder of page intentionally left blank]*

Dated: June 25, 2025  
Wilmington, Delaware

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